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9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 IN RE: CATHODE RAY TUBE (CRT)
13 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-JST

MDL No. 1917

14 This Document Relates to:

15 *Sears, Roebuck and Co. and Kmart Corp. v.*
16 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-
17 05514

**DECLARATION OF CATHLEEN
HARTGE IN SUPPORT OF DEFENDANT
LG ELECTRONICS, INC.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL IN CONNECTION WITH
LG ELECTRONICS, INC.'S REQUEST
FOR LEAVE TO FILE ADDITIONAL
MOTIONS**

[Administrative Motion to Seal and [Proposed]
Order filed concurrently herewith]

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28 MDL No. 1917
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**DECLARATION OF CATHLEEN HARTGE IN SUPPORT OF DEFENDANT LG ELECTRONICS, INC.'S
ADMINISTRATIVE MOTION TO FILE UNDER SEAL IN CONNECTION WITH LG ELECTRONICS,
INC.'S REQUEST FOR LEAVE TO FILE ADDITIONAL MOTIONS**

1 I, Cathleen H. Hartge, hereby declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of
3 record for Defendant LG Electronics, Inc. ("LGE"), in the above entitled action. I am licensed
4 to practice law in the State of California. I make this declaration based on my personal
5 knowledge and, if called upon as a witness, could and would testify competently as to the
6 matters set forth below.

7 2. Pursuant to Civil Local Rules 7-11 and 79-5, I submit this declaration in support
8 of the LGE's Administrative Motion to File Under Seal.

9 3. LGE seeks permission to file under seal the highlighted portions of the sealed
10 version of its Request for Leave to File Additional Motions.

11 4. The highlighted portions of the document referenced in Paragraph 3 contain
12 discussion, analysis, references to, or information taken directly from, material designated by
13 Plaintiffs Sears, Roebuck and Co. and Kmart Corporation (the "Designating Parties") as
14 "HIGHLY CONFIDENTIAL" under the Stipulated Protective Order (Dkt. No. 306).

15 5. LGE seeks to submit the above material under seal in good faith in order to
16 comply with the Stipulated Protective Order in this action and the applicable Standing Order and
17 Local Rules. Because the information LGE seeks to submit under seal has been designated as
18 Highly Confidential by other parties, LGE is filing the accompanying Administrative Motion,
19 and will be prepared to file unredacted versions of the above-referenced documents in the public
20 record if required by Civil Local Rule 79-5(e).

21 I declare under penalty of perjury under the laws of California that the foregoing is true
22 and correct.

23 Executed on the 12th day of April 2016 in San Francisco, California.

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26 /s/ Cathleen Hartge
27 CATHLEEN HARTGE

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